

# HAFETZ NECHELES & ROCCO

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February 28, 2012

VIA EMAIL AND ECF

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Roger Burlingame, Esq.  
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United States Attorney's Office  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Pedro Espada, Jr., et al.*, 10-CR-985 (FB)

Dear Counsel:

Yesterday before court, you proposed that neither defendants nor the government elicit information of the prior indictments and guilty pleas in 2005 by Norma Ortiz, Maria Cruz and other individuals related to the reelection campaign of Pedro Espada, Jr. We write now because we want to make sure that we understand your proposal correctly.

Specifically, we want to know whether you are suggesting that *all* evidence pertaining to the 2005 indictments and guilty pleas be excluded from trial?

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Please let us know as soon as possible because of the relevance of this question to Mr. Espada's conflict issues.

Very truly yours,

By: /s/Susan R. Necheles  
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